

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TARRILL PETERS, JR.

Plaintiff,

v.

CITY OF CHICAGO, COOK COUNTY,  
SERGEANT MICHAEL PETRASKI, STAR  
NUMBER 21001, DETECTIVE NAN  
MORALES, STAR NUMBER 20741,  
DETECTIVE ARTHUR TARASZKIEWICZ,  
STAR NUMBER 21183, DETECTIVE  
JOSEPH MARSZALEC, STAR NUMBER  
21234, DETECTIVE JOHN CAMPELL,  
STAR NUMBER 21279, DETECTIVE  
THOMAS FLAHERTY, STAR NUMBER  
1732, ASSISTANT STATE'S ATTORNEY  
MARTIN MOORE,

Defendants.

No. 21-cv-4366

Judge: Hon. Charles R. Norgle, Sr.  
Magistrate: Hon. Susan E. Cox

**DEFENDANTS, COOK COUNTY and ASSISTANT STATE'S  
ATTORNEY MARTIN MOORE'S, UNOPPOSED MOTION FOR  
EXTENSION OF TIME AND FOR LEAVE TO ANSWER  
OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendants, COOK COUNTY and ASSISTANT STATE'S ATTORNEY MARTIN MOORE, by and through their attorneys, Tribler Orpett & Meyer, P.C., for their motion for extension of time and for leave to answer otherwise plead to Plaintiff's Complaint, pursuant to Federal Rule 6(b), state as follows:

1. Defendants, Cook County and Assistant State's Attorney Martin Moore, retained outside defense counsel to represent them in this matter on September 20, 2021, and their counsel needs additional time to confer with them and to conduct an initial investigation.

2. Per the Pacer docket report, Defendant, Cook County and Assistant State's Attorney Martin Moore were served with Summons and Complaint on August 19, 2021.

3. Per the Pacer docket report, Defendant, Cook County and Assistant State's Attorney Martin Moore's, answer or other responsive pleading was due on September 9, 2021.

4. Defendants, Cook County and Assistant State's Attorney Martin Moore require additional time to answer or otherwise plead.

5. Defendants, Cook County and Assistant State's Attorney Martin Moore, respectfully requests additional time, up to and including November 8, 2021, to answer or otherwise plead.

6. Defendants, Cook County and Assistant State's Attorney Martin Moore's, counsel has conferred with one of Plaintiff's counsel, Aaron J. Hersh, on September 23<sup>rd</sup> and 27<sup>th</sup> regarding this motion and confirmed that Plaintiff does not oppose the extension of time.

7. This motion is brought in good faith and not for purposes of delay.

WHEREFORE, Defendants, COOK COUNTY and ASSISTANT STATE'S ATTORNEY MARTIN MOORE, respectfully request that this Honorable Court grant their motion for additional time up to and including November 8, 2021 to answer or otherwise plead.

Respectfully submitted,

s/ William B. Oberts

Attorney for defendants, Cook County and  
Assistant State's Attorney Martin Moore

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of **Defendants' Unopposed Motion for Extension of Time and for Leave to Answer or Otherwise Plead to Plaintiff's Complaint** was served upon:

<b><u>Attorneys for Plaintiff</u></b> Aaron J. Hersh Bianca L. Valdez Michael G. Babbitt Craig C. Martin Willkie Farr & Gallagher LLP 300 North LaSalle Chicago, IL 60654 312-728-9000 <a href="mailto:ahersh@willkie.com">ahersh@willkie.com</a> <a href="mailto:bvaldez@willkie.com">bvaldez@willkie.com</a> <a href="mailto:mbabbitt@willkie.com">mbabbitt@willkie.com</a> <a href="mailto:cmartin@willkie.com">cmartin@willkie.com</a>  Daniel Massoglia First Defense Legal Aid 601 S. California Ave. Chicago, IL 60612 336 575 6968 <a href="mailto:daniel@first-defense.org">daniel@first-defense.org</a>	<b><u>Attorneys for City of Chicago</u></b> Eydie R. Vanderbosch Eydie R. Vanderbosch, Esq. Legal and Consulting Services 10 S. Riverside Plaza Suite 875 Chicago, IL 60606 (312) 523-5299 <a href="mailto:eydie@ervjd.com">eydie@ervjd.com</a>
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service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5 as to any party who is not a Filing User or represented by a Filing User by mailing a copy to the above-named attorney or party of record at the address listed above, from 225 W. Washington Street, Suite 1300, Chicago, IL 60606, prior to 5:00 p.m. on the 27<sup>th</sup> day of September, 2021, with proper postage prepaid.

s/ William B. Oberts  
an Attorney